

**From:** [Sablad, Elizabeth](#)  
**To:** [Lum, Darryl C](#); [kris.poentis@doh.hawaii.gov](mailto:kris.poentis@doh.hawaii.gov)  
**Cc:** [Dan Connally](#)  
**Subject:** Comments on revised draft Kailua WWTP (HI 0021296)  
**Date:** Friday, August 23, 2013 2:48:01 PM

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Hi Darryl and Kris,

Here are my comments on the revised Kailua WWTP draft permit:

1. The compliance schedule justification in the fact sheet needs a stronger link between the assessment of the length of this specific schedule, the interim requirements for this specific schedule, and the CFR requirements.
2. There is reference to an accelerated monitoring trigger for ammonia and nitrate+nitrate in footnote 2 to the effluent limit table on page 4 of the permit. Is this carryover from the previous permit's threshold requirement? It doesn't seem relevant here.
3. In the ZOM limits section of the permit – it may not be necessary to include ammonia, since there are already end-of-pipe limits for ammonia and no assimilative capacity is available.
4. Page 19 of the permit, offshore monitoring – it would be good to link these monitoring requirements with the ZOM limits.
5. There is a comment by Dan that the discharge point is 1500 feet north of the ZOM – how did the facility determine the direction/extent of their discharge plume? Is this based on the dilution model from 1985?
6. Page 27 of the permit – the Pretreatment reporting address for EPA should be addressed to the “Regional Pretreatment Coordinator” with the WTR-5 mailcode.
7. Page 39 of the permit discusses that if a sampling result is below the MDL, it should be reported as “0.” Wouldn't it be better to be reported as “ND” or non-detect? I have seen this language in only one other permit – is it new?
8. Page 41 of the permit includes the same sentence twice regarding the sludge reporting requirement to EPA.
9. Why was there no chlorine data? Was the discharger not required to monitor for chlorine in the previous permit? What about a priority pollutant scan?
10. Page 15 of the fact sheet includes a typo: a paragraph starting with “During periods...” should start without those words.
11. Recommend including enterococcus RPA information in the RPA table.

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**From:** Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]  
**Sent:** Wednesday, August 14, 2013 1:28 PM  
**To:** Sablad, Elizabeth  
**Cc:** kris.poentis@doh.hawaii.gov  
**Subject:** Kailua WWTP (HI 0021296)

Hi Elizabeth,

Attached is the draft permit and fact sheet for Kailua WWTP. Please let us know if you have any comments. After your comments are addressed we will proceed to public notice.

Thanks,  
Darryl

**Darryl Lum**  
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